Exhibit E

Ben Kussman

From: Jesse Franklin-Murdock (Dhillon Law) <JFM@dhillonlaw.com>

Sent: Monday, April 17, 2023 10:42 AM

To: Christopher T. Berg
Cc: Nitoj Singh (Dhillon Law)
Subject: Proposed Amendments to TRO

Attachments: 20230417_Table_ProposedAmendmentsTRO_final.pdf; Exhibits_Amendment_TRO.zip

Chris,

As a result of the TRO, MovementDAO has been unable to pay certain vendors, and our clients have advanced the funds for other expenses. Most notably, Mikhail Radin returned \$238,417.67 of funds he was paid for his work in 2022. The attached table contains our proposed amendments to the TRO so that MovementDAO can continue its business. The zipfolder contains the referenced exhibits. Our clients have identified three expenses most vital to MovementDAO's business for payment, which are bolded in the table.

We further request that your clients agree that the following personal accounts may be released from the TRO (to the extent they are covered by the TRO). These are our clients' personal accounts so freezing them is causing them to incur personal hardship as they would otherwise use their personal funds therein to pay bills and living expenses.

- 1. Mr. Reed's Wells Fargo checking account ending in 9216.
- 2. Mr. Phillips Robinhood account.

We request that you discuss with your clients whether they will consent to MovementDAO paying these three expenses and releasing the above accounts from the TRO. If not, we will seek emergency relief from the court for permission to do so. Given the time-sensitive nature of this matter, we request a response tomorrow.

Thanks, Jesse

Jesse Franklin-Murdock, Esq.

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